Draft- For Discussion Purposes Only

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
AND FACSIMILE

Mr. Ronald Frehner
Project Coordinator - ACS NPL Site
Conestoga-Rovers & Associates
1801 Old Highway 8, Suite 114
St. Paul, Minnesota 55112

Dear Mr. Frehner:

This letter is in response to your letters dated June 20 & 26, and July 27, 1995, to the United States Environmental Protection Agency (U.S. EPA) for the American Chemical Services, Inc., National Priorities List Site in Griffith, Indiana (ACS Site) undergoing remedial design/ remedial action pursuant to Unilateral Administrative Order (Docket No. V-W-95-C-260) (UAO).

The letters were regarding the issue of whether a permit will be required for the proposed effluent discharge of groundwater to the wetlands from the treatment system to be installed at the ACS Site, and proposed effluent limitations for the proposed discharge of groundwater from the treatment system to the wetlands.

IDEM who has primary responsibility with regards to permit issuance in these matters has determined that no permit would be required for the proposed effluent discharge. The IDEM has however performed a review based on the ACS site information, and determined that if a permit were required, the enclosed effluent limitations would apply. Hence, the limitations on the enclosure herein are relevant and appropriate to this case (i.e, ARARs), and must be met.

If you need further clarification on this matter, you can call me at (312) 886-4745.

Sincerely,

Sheri L. Bianchin
Remedial Project Manager

Enclosure

AMERICAN CHEMICAL SERVICES, INC., GRIFFITH, LAKE COUNTY, INDIANA
FINAL NPDES NUMBERS FOR DISCHARGE TO NO FLOW WETLANDS

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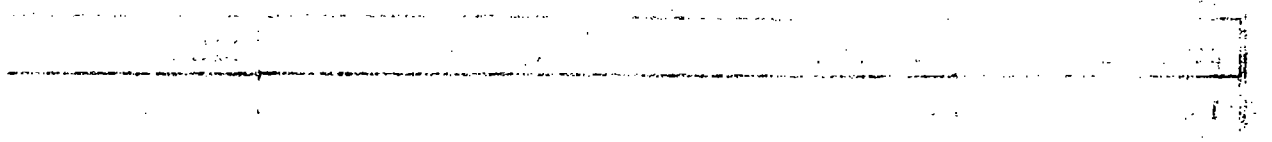
Table 7: ROD	Respondent proposal	NPDES FINAL #	RATIONALE
benzene	29 ug/l	5 ug/l (drinking AWQC)	MCL
vinyl chloride	---	2 ug/l (drinking AWQC 0.014)	MCL
PCB	1.0 ug/l	~~0.00056 ug/l~~ 0.014	~~MCL~~ IWQEL
bis (2-chloroethyl) ether	533 ug/l	~~9.6 ug/l~~ – this is human * need IDEM site calc. ug/l	IWQEL
arsenic	0.19 mg/l	~~0.12 ug/l~~ 0.05 MCL	~~IWQEL~~
tetrachlorethene	24 ug/l	5.0 ug/l	MCL
† * methylene chloride	498 ug/l	100 ug/l	BAT/PA
chloromethane	---		
† * beryllium	---	~~0.83 ug/l~~ 12.6	IWQEL
trichloroethene	189 ug/l	5 ug/l	MCL
bis (2-ethylhexyl) phthalate	49 ug/l	6 ug/l	MCL
cyclic ketones	xxx		
pentachlorophenol	3.83 ug/l	1 ug/l	MCL
1,4 dichlorobenzene	---		
isophorone	267 ug/l	50.0 ug/l	BAT/PA
2-butanone	7,156 ug/l	210 ug/l	BAT/PA
4-methyl 2-pentanone	1,160 ug/l	15 ug/l	BAT/PA
noncyclic acids	xxx		
† * acetone	---	109 ug/l	BAT/PA
branched alkanes	xxx		
ethyl benzene	34 ug/l		*
† * thallium	---	2 ug/l 9.5 equation	MCL
dimethyl ethyl benzene	xxx		
1,2 dichloroethene (cis)	---	30 ug/l	BAT/PA
† manganese	---		
4-methyl phenol	34 ug/l		*
1,1 dichloroethane	---		

† prob. require addition of reverse osmosis

* greatest problem for treatm. syst. † hardest to treat w/oxidation & carbon polishing

MCL: Maximum Contaminant Level
IWQEL: Indiana Water Quality Effluent Limits
BAT/PA: Best Available Treatment established by Pennsylvania DER
*: Accept Montgomery Watson value provided within their proposal



GENERAL CONDITIONS

1. The BOD_5 may be no more than 30 mg/L.

2. The TSS may be no more than 30 mg/L.

3. The pH shall not be less than 6.0 nor greater than 9.0 based on standard units. The pH shall be monitored by a grab sample, once monthly.

4. The discharge shall not cause excessive foam in the receiving waters/areas. The discharge shall be essentially free of floating and settleable solids.

5. The discharge shall not contain oil or other substances in amounts sufficient to create a visible film or sheen on the receiving waters/areas.

6. The discharge shall be free of substances that are in amounts sufficient to be unsightly or deleterious or which produce color, odor, or other conditions in such a degree as to create a nuisance.

7. The discharge shall not contain any substance in any amount sufficient to be acutely toxic to, or to otherwise severely injure of kill aquatic life, other animals, plants, or humans.

8. The discharge shall not contain any substances or combination of substances in amounts that will cause or contribute to the growth of aquatic plants or algae to such degree as to create a nuisance, be unsightly or otherwise impair the designated use.

9. There shall be no debris discharge. Debris is defined as woody material such as bark, twigs, branches, heartwood or sapwood that will not pass through a 1.0 in diameter round opening and is present in the discharge from a wet storage facility.

Monitoring and Reporting

1. Samples taken in compliance with these limitations shall be taken at a point representative of the discharge but prior to entry into the receiving waters/areas and must be representative of the volume and nature of the monitored discharge. Specific sampling protocols will be developed in the Performance Standards Verification Plan developed in the Perimeter Groundwater Containment System Work Plan.

2. Compliance will be demonstrated if the observed effluent concentrations are less than the limit of quantitation (LOQ). If the measured effluent concentrations are above the limitations and above this limit of detection specified herein in any of three (3) consecutive analyses or any five (5) out of nine (9) analyses, changes must be instituted to assure compliance with the LOQ.

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Effluent concentration less than the limit of quantitation shall be reported as the actual value. Effluent concentrations less than the limit of detection shall be reported on discharge monitoring report forms as less than the value of the limit of detection. For example, if a substance is not detected at a concentrations 0.01 mg/l, report the value as < 0.01 mg/l.

3. A case-specific method detection limit (MDL) or LOQ may be specified if approved by U.S. EPA/IDEM prior to use. Generally, the MDL shall be derived by the procedure specified for MDLs contained in 40 CFR 136, Appendix B, and the LOQ shall be set at 2.5 times the MDL. The MDL shall be set at 2 times the LOD. Other methods may be used if first approved by U.S. EPA/IDEM.